JAP:LKG	
UNITED STATES DISTRICT COURT EASTERN DISTRICT OF NEW YORK	15-827 M
UNITED STATES OF AMERICA	COMPLAINT
- against -	(21 U.S.C. § 952(a) and 960)
ESTHER EUFEMIA NIN,	
Defendant.	
X	
EASTERN DISTRICT OF NEW YORK, SS:	

Robert Turner, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations ("HSI"), duly appointed according to law and acting as such.

On or about August 30, 2015, within the Eastern District of New York and elsewhere, the defendant ESTHER EUFEMIA NIN, did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960)

The source of your deponent's information and belief are as follows:¹

1. On or about August 30, 2015, the defendant ESTHER EUFEMIA NIN, a citizen of the Dominican Republic, arrived at John F. Kennedy International Airport

Because the purpose of this Complaint is to state only probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

("JFK") in Queens, New York aboard Delta Airlines Flight 985 from Santo Domingo, Dominican Republic.

- 2. The defendant was selected for a Customs and Border Protection ("CBP") examination. The defendant presented a blue Wisdom roller suitcase (the "suitcase") and a black purse for inspection. The defendant confirmed that the suitcase and its contents belonged to her, and that she packed the suitcase herself.
- 3. A search of the suitcase revealed six hangers. When a CBP officer initially handled one of the hangers, the officer observed that it was unusually heavy. The CBP officer further observed that the hanger had markings on it, appearing as though it had been altered. The CBP officer subsequently probed the hanger, which revealed a white, powdery substance that field-tested positive for the presence of cocaine. The total approximate gross weight of the cocaine recovered inside of the six hangers was 2,621 grams.

WHEREFORE, your deponent respectfully requests that the defendant

ESTHER EUFEMIA NIN be dealt with according to law.

Dated:

Brooklyn, New York

August 31, 2015

ROBERT TURNER

Special Agent

United States Department of Homeland Security

Homeland Security Investigations

Sworn to before me this 31st day of August, 2015

S/ Steven Gold

THE HONORABLE STEVEN M. GOLD UNITED STATES MAGISTRATE JUDGE EASTERN DISTRICT OF NEW YORK